

119811

# Wings Unlimited, inc.



25900 W. 111th Street • Olathe, KS 66061-9303  
Cedar Airpark Airport • 913-782-5176

December 27, 2000

Docket Management System  
U. S. Department of Transportation  
Room Plaza 401  
400 Seventh Street, S.W.  
Washington, DC 20590-0001

01 JAN -2 PM 12:31

DEPT. OF TRANSPORTATION  
DOCKET

RE: Docket No. FAA-2000-8274: Notice No. 00-13 - 41

To Whom It May Concern:

We have been covering major sporting events for over twenty years without injury to the flying and non-flying public. My concerns are with the economic impact this NPRM will have on our company and industry.

The following are some of my thoughts and questions concerning this NPRM:

This NPRM looks like a "catch all" that is trying to regulate anything and everything. Did it start out to regulate disaster and hazard areas then you added aerial demonstrations then the sports owners jumped on the band wagon and decided to add sporting events?

As a pilot 91.137 is perfectly clear to me. I think, 91.137 (a) (3) "or event which may generate a high degree of public interest", has been miss-interpreted by many major sporting event coordinators to think it applies to them because their event generates a high degree of public interest. I believe you only have to look at the intent of this regulation to understand that it was meant only for hazards such as floods, fires, volcano's or other such disasters.

As far as 91.145: Is it your intent to issue TFR's every time the Blue Angles, Thunderbirds and Golden Knights have an air demonstration or fly over all sporting events? This would close airspace down for a long time. For every minute the airspace is closed it costs us Dollars. Most of our revenue is made over these major sporting events

If you are protecting government aircraft, and aircraft doing aerobatics why not add aerial banner operators to the TFR and allow them to fly in the airspace around major sporting events and keep out all the sightseers. It seems that the people complaining about the traffic are just upset because the banner tow aircraft are taking revenue away from their in-house sales.



I think this regulation opens up a Pandora's box that will close down many areas to aerial banner tow operators. This regulation will cause the FAA to get mixed up in every Major Sporting event in their areas and will have the, owners of RACETRACKS, FOOTBALL, BASEBALL, GOLF CLUBS, ect. going to the local FAA asking them to close down the airspace because they do not want banner aircraft or any other aircraft except by invitation: i.e. military, flying around their event. This regulation will cause major problems for all banner tow operators. It will definitely limit air commerce in a lot more areas than the FAA can imagine. Next you will have all persons involved in outdoor events asking the FAA to ban flying around their events. This could have far reaching effects.

By the way what is your **definition** of a Major Sporting Event and Aerial Demonstration? Will a Major Sporting Event be a factor if it is close to a large commercial airport? Will you close the airport to Commercial Airlines if the Major Sporting Event is close to the airport? Will you not allow Commercial Airlines to fly because there are Aerial Demonstrations going on, or will they be allowed to fly in and out because you do not want to inconvenience the flying public? Will it be ok to stop the flight instructor or the flying businessman from their flights? Who will be making these decisions?

**"Executive Order 12866 and DOT Regulatory Policies and Procedures:**

Because the possibility of such occurrences is for a limited time and the restricted areas are limited in size, circumnavigation cost would be negligible." **This is not the case.** Our business is predicated on being able to operate around the event before and during the event. It will financially devastate several forms of air commerce. I.E. banner tow operators, helicopter news reporters, photographers, and blimps operating in these areas.

AVIATION SAFETY IS NOT A FACTOR IN THIS NPRM. Aerial banner tow operators are required to get a wavier from the FAA every two years. If the operator is a hazard to the flying public the local FAA has the ability to not renew that certificate or add restrictions to their operations.

Please do not pass this NPRM in its current form. If there is a need to make further changes in the section of natural hazards or disasters then you should address this issue, but DO NOT add sporting events to this issue and limit air commerce.

Respectfully,



Patricia Hockett  
Chief Pilot